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May 30, 2019

VIA ECF

Judge Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Rajaratnam v. Motley Rice, LLC, et al*, No. 1:18-cv-03234-KAM-RML;
Request for Modification to Briefing Schedule for Motions to Dismiss**

Dear Judge Matsumoto:

We represent Plaintiff Raj Rajaratnam in the above-referenced action. We write to request a modification to the briefing schedule for Defendants' motions to dismiss the Amended Complaint. This is the first request for an adjournment of that briefing schedule. Prior to submitting this request, we conferred with counsel for defendants Motley Rice, LLC and Michael Elsner, and counsel for defendants Kanetkar, Allison and Mallon. All counsel have consented to the proposed revised scheduling order (see attached).

On January 18, 2019, Mr. Rajaratnam filed an Amended Complaint in this action. Pursuant to the Order dated February 6, 2019, the parties conferred on a briefing schedule for Defendants' proposed motions to dismiss the Amended Complaint. By letter dated February 8, 2019, the parties agreed to a proposed briefing schedule that provided as follows: Defendants' motions to dismiss the Amended Complaint be served by April 12, 2019; Plaintiff's opposition brief be due 60 days thereafter on June 12, 2019; and Defendants' reply brief be due 30 days thereafter on July 12, 2019. The Court adopted the parties' proposed briefing schedule in its Order dated February 26, 2019. On April 12, 2019, the Defendants served their respective motions to dismiss the Amended Complaint and supporting papers.

Because of personal and professional obligations, Plaintiff's counsel has requested, and Defendants' counsel has agreed, to modify the existing briefing schedule so that

Hon. Kiyo A. Matsumoto

May 30, 2019

Page 2 of 2

Plaintiff's counsel has an additional 14 days, to June 26, to serve Plaintiff's opposition. Counsel for the parties have further agreed that, in light of this extension of Plaintiff's time to file his opposition brief, the time for service of Defendants' reply briefs will be extended to August 8, 2009. The proposed revised briefing schedule is as follows: Plaintiff's opposition brief to be served on or before June 26, 2019; and Defendants' reply briefs to be served on or before August 8, 2019.

We thank the Court for its consideration of this request.

Respectfully submitted,

Jonathan D. Lupkin

Jonathan D. Lupkin

cc: All Counsel of Record (via ECF)